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7 Attorneys for Defendant

8  
9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10 BETTY L. MIERS, ) Case No: 2:15-cv-01229-JAD-VCF  
11 Plaintiff )  
12 v. ) **DEFENDANT'S MOTION FOR**  
 ) **EXTENSION OF TIME TO FILE CROSS-**  
 ) **MOTION TO AFFIRM**  
13 CAROLYN W. COLVIN, Acting )  
Commissioner of Social Security, )  
14 Defendant. )  
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1 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (the  
2 Commissioner), moves, with the approval of this Court, for an extension of time to file her  
3 Cross-Motion To Affirm by thirty-one days from December 18, 2015 to January 18, 2016. This  
4 is the Commissioner's first request for an extension.

5 There is good cause because the Commissioner's counsel is currently experiencing a  
6 heavy workload and has been out of the office unexpectedly. The Commissioner makes this  
7 request in good faith and needs additional time to respond to the issues Plaintiff Betty L. Miers  
8 (Plaintiff) raised in her Motion For Judgment On The Pleadings. Counsel emailed Plaintiff  
9 regarding this extension, but, at the time of filing, had not yet received a response.

10 Respectfully submitted,

11 Date: December 18, 2015

DANIEL G. BOGDEN  
United States Attorney  
BLAINE T. WELSH  
Chief, Civil Division

14 By: /s/ April A. Alongi  
15 APRIL A. ALONGI  
Special Assistant United States Attorney

16 Attorneys for Defendant

20 IT IS SO ORDERED.

23  
24 DATE: January 6, 2016

  
25 THE HONORABLE CAM FERENBACH  
United States Magistrate Judge

**DEFENDANT'S CERTIFICATE OF SERVICE**

I certify that I caused a copy of the Defendant's Motion For Extension Of Time To File Cross-Motion To Affirm to be served, via CM/ECF notification, on:

DANIEL S. JONES  
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HAL TAYLOR  
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Date: December 18, 2015

DANIEL G. BOGDEN  
United States Attorney  
BLAINE T. WELSH  
Chief, Civil Division

By: /s/ April A. Alongi  
APRIL A. ALONGI  
Special Assistant United States Attorney  
  
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